Regarding measurement guidelines for Access Broadband over Power Line Systems

ET Docket No. 04-37

It is my fact-based opinion that deployment of BPL in the HF frequency range is a grave mistake with little redeeming value; however, since the Commission has decided to allow BPL under part 15 guidelines, here are some thoughts as to how BPL might be measured so as to minimize a pending calamity.

The current 30uv/meter of allowed radiation from a part 15 device is much too high to protect receivers in the Amateur Radio Service, shortwave listeners, aircraft and public safety from debilitating interference.

Some parties have suggested that antennas might already be oriented to minimize both power line noise and also BPL interference but this statement shows little understanding of the constraints placed on ARS stations, shortwave listeners, and other HF users. Antennas are located where existing supports are available in the case of wire antennas, and in many cases station locations have no great land area available to locate antennas away from interference sources.

BPL interference measurements should also be made at the receiver end of the antenna transmission line so that HF users with efficient antennas are not penalized with excessive noise. Most texts agree that a communications receiver should display a 50 microvolt RMS signal at a receive level of S9. Where atmospheric noise does not limit reception signals are easily readable to below the S1 level, which is roughly 5 microvolts RMS across 50 ohms at the receiver terminals. BPL interference should be limited to no more than 5 microvolts at the receiver terminal regardless of other measurements.

The BPL service providers should be required to respond to interference complaints in a timely manner. A telephone number with operator available 24 hours daily should be provided. It is not possible to know when errant BPL devices might become an extreme hazard so a constant watch is necessary. Currently the trend is automated answering devices that shield personnel from ever having to talk to the public. These dodges must not be allowed to prevent contacting a BPL service provider with interference problems. If the interference cannot be resolved remotely or field measurements made in a timely manner than the BPL devices in the area receiving interference must be shut down pending resolution of the problem. The BPL devices must not be allowed to continue operation while causing interference. Monetary forfeitures for non-compliance will be necessary to insure a reasonable level of compliance; otherwise, foot dragging and other ploys will be used by the unscrupulous to avoid addressing interference problems.

Because BPL devices will be interfered with by licensed users of the HF spectrum, it should be mandated that the BPL service provider strictly avoid blaming or otherwise implicating ARS, public service, or other licensed services as the cause of a service outage. It is not reasonable for an individual or small organization to be placed in the position of having to defend to an irate public the use of

spectrum to which they are duly licensed.

I will not be easily dissuaded from my conclusion that deployment of BPL under the auspices of part 15 guidelines is a calamity for any licensed HF user.

Broadband access should be provided by secure fiber deployments that are future proof and much more broad than the unique HF spectrum.

Respectfully submitted

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